

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION

PUBLIC INTEREST LEGAL FOUNDATION,  
INC.,

Plaintiff,

v.

HOWARD M. KNAPP, in his official capacity  
as Executive Director of the South Carolina  
Election Commission,

Defendant.

Case No.: 3:24-cv-01276-JFA

**Defendant's Opposition to Supplemental Motion for Attorneys' Fees**

Howard M. Knapp (Knapp), in his official capacity as Executive Director of the South Carolina Election Commission (SEC),<sup>1</sup> respectfully opposes the supplemental motion for attorneys' fees filed by the Public Interest Legal Foundation, Inc. (PILF), ECF No. 50, for the same reasons set forth in his originally-filed Opposition to Attorneys' Fees and Request to Hold Consideration of the Motion in Abeyance. ECF No. 42. In short, the SEC respectfully asks that the Court hold consideration of PILF's motion in abeyance because the SEC has also filed a motion to reconsider or, in the alternative, to grant relief from the Court's September 18, 2024 Order, ECF No. 38. *See* Fed. R. Civ. P. 59(e), 60(a). Alternatively, if the Court does not believe it appropriate to hold consideration of the motion in abeyance, the SEC respectfully requests that the Court establish a comprehensive briefing schedule to fully flesh out the issues and assertions in PILF's motion. And, alternatively, if the Court believes it appropriate to proceed to consider PILF's

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<sup>1</sup> Because Knapp is named in his official capacity only, Defendant is identified as the SEC unless otherwise noted.

motion, there remain deficiencies in that motion that warrant denying the motion in its entirety or, at a minimum, reducing the award.

Respectfully submitted,

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December 3, 2024

Columbia, South Carolina